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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 15, 1993

93-RF-2312

Frazer R. Lockhart
Environmental Restoration Division
DOE, RFO

APPLICABILITY OF F039 TO SOLAR PONDS WASTES - EML-157-93

As you know, there has been lengthy debate within EG&G Rocky Flats, Inc. on the applicability of the F039 waste code. The final listing for the F039 code was established in 1990, and per the Federal Register, June 1, 1990, the code applies only from May 8, 1990, the date of its promulgation. With regard to the Solar Ponds, there appears to be no clear way to demonstrate that the code does not apply; and, therefore, we feel it is prudent to incorporate the F039 code into our planning. This letter documents our reasoning, and provides a preliminary approach to incorporating the code.

Applicability of F039

The F039 designation within the ponds arises from the Interceptor Trench System water. The code would then follow the trench water, and apply to wastes which include trench water. The trench water has been placed in the A pond and B series ponds: A pond and B series ponds sludge and water would therefore include the F039 waste code in their designations.

The C pond and clarifier do not, however, acquire the F039 waste code. C pond and the clarifier have been isolated, and have not received any waste subsequent to May 8, 1990 (for example, as documented in the Historical Release Report).

Plan to Incorporate F039

- Obtain concurrence from the regulators on lack of F039 applicability to C pond and the clarifier. This must be accomplished soon to support FY93 activities. We would like to receive concurrence by April 9, 1993.
- Establish a list of analytes for the B ponds through discussions with the regulators. EG&G will search available data bases to identify F039 analytes that have never been on plant site or have never been detected on plant site. This activity is important to processing B pond sludge, and perhaps to the final remedy for the Solar Ponds, but can be initiated following the C pond/clarifier decision. We do not know how long the activity will take, so it is prudent to discuss this with the regulators soon to expedite scheduling activities.

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| ERRERA, D.W. | | |
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| ULLIVAN, M.T. | | |
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| WILSON, J.M. | | |
| ANE, J.O. | | |
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| DEG, R. | X | |
| ORDON, K. | X | |
| ENT, S. | X | |
| SC, ERT, A. | X | |
| EDRICH, P. | X | |
| BRNDT, M. | X | |
| BUDDY, M. | X | |
| CRACK, S. | X | |
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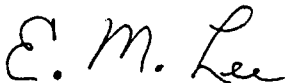
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- Based on the analysis list established, revise project plans to incorporate any rework of past characterization and treatability studies as necessary, and revise waste analysis plans for the product B pond Pondcrete.
- Incorporate changes into Work Package. Proceed with implementation.

Obtaining the regulator's concurrence on the lack of F039 applicability to the C pond and clarifier is an important, near-term objective. Request that initiate contact with the regulators on this issue. A draft letter is attached for your convenience.

If you would like to discuss the F039 impacts further, please call me or Steve Keith on 966-8541.



E. M. Lee
Program Manager
Solar Ponds Remediation
EG&G Rocky Flats

KCL:apt

Orig. & 1 cc - F. R. Lockhart

Attachment:
As Stated

cc:
S. Howard - DOE, RFO
T. E. Lukow - " "

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

WASTE CODE DESIGNATION AT ROCKY FLATS SOLAR PONDS

Our staffs have previously discussed the applicability of the waste code F039 to the Solar Evaporation Ponds at the Rocky Flats Plant. We have previously discussed the Solar Ponds as if they were a single impoundment. The various ponds have different histories of waste placement, however, and the F039 code appears to apply to the A and B series ponds only. The distinction is important to our near-term planning for the baseline scenario, which calls for cementing of C-pond sludge in 1994. Whether the baseline is retained or an alternative approach is adopted, DOE wants the waste codes to be assigned accurately. This letter presents our reasoning and seeks your response.

The F039 waste code applies to multi-source leachates. The Solar Ponds are a potential multisource, since each impoundment contains more than one listed hazardous waste. If the downward migration of these liquid hazardous constituents is viewed as leachate, then multi-source leachate enters the ground water below the ponds. This leachate and groundwater are collected in the Interceptor Trench System (ITS). The ITS water, therefore, is the origin of the F039 designation.

ITS water has been added to the A and B-series ponds since May 8, 1990. The F039 designation, therefore, would apply to both water and sludge in the B series ponds (A pond has been consolidated into the B-series impoundments).

C pond and the clarifier, however, have been isolated from ITS water since well before May 8, 1990. No ITS water has entered these portions of the Solar Ponds unit. F039 does not, therefore, extend to C pond and the clarifier.

While DOE's near term need is to finalize this determination that F039 fails to apply to C pond and the clarifier, we acknowledge that ancillary issues may require discussion. Such issues include, for example, the application of F039 to soils and groundwater, and whether wastes and environmental media can be tested only for those F039 constituents that might reasonably be present.

Please let us know if you concur with the non-applicability of F039 to C pond and the clarifier. We feel this issue is straight forward, and request your response by the end of March. If this time frame is unacceptable, please let me know. For further discussion, please contact me or Steve Howard on 966-3040.